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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Consider Adoption of a General Order and Procedures to Implement the Digital Infrastructure and Video Competition Act of 2006	R.06-10-005

COMMENTS OF THE UTILITY REFORM NETWORK

October 25, 2006

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Pursuant to the schedule established in the Order Instituting Rulemaking ("OIR"), The Utility Reform Network ("TURN") submits these Comments in the above-captioned proceeding.

I.INTRODUCTION

It is apparent from the OIR and the proposed General Order ("G.O.") that the Commission is carefully attempting to track the enabling legislation, Assembly Bill ("AB") 2987. For the most part the Commission's proposals are consistent with that bill. However, TURN submits that there are at least two areas where the Commission has failed to meet the statutory requirements – the prohibition on the ability of parties to protest video franchise applications and the complete lack of any procedures to ensure that Public Utilities Code Section 5940's prohibition on cross-subsidization is enforced.

TURN will discuss these issues as well as the questions related to intervenor compensation and community service centers raised in the OIR in the comments below.

II.THE COMMISSION'S INTENT TO PROHIBIT PROTESTS IS AN INCORRECT INTERPRETATION OF AB 2987

In the OIR, the Commission expresses its tentative conclusion that no protests of video franchise applications will be permitted stating,

> Given that the Commission is the sole state video franchising authority and the application process and authority granted to us shall not exceed provisions set forth in Public Utilities Code § 5840, we tentatively find that Public Utilities Code § 5840 does not provide for any protest to the Commission's issuance of a state video franchise, and thus none should be allowed.[1]

The Commission's rationale here is strained at best, and worst case, is an abuse of discretion. The fact that § 5840 "does not provide for any protest" is hardly a definitive expression of legislative intent. Had the Legislature intended to prevent protests, which is an unusual and extreme position, the members could just have easily placed such a explicit prohibition in the bill. The Commission appears to believe that its role in issuing video franchises is purely ministerial and one of rubber-stamping the application. However, § 5840 requires franchise applicants to provide an array of information, some of which clearly would be subject to interpretation and possible protest by consumers.[2] AB 2987 also requires that the Commission rule on the accuracy and sufficiency of the required information, therefore, as a public, regulatory body, necessitating input from the public and due process on behalf of both the applicant and the public. Further, AB 2987 specifically requires the "applicant will concurrently deliver a copy of the application to

[1] Order Instituting Rulemaking to Consider the Adoption of a General Order and Procedures to Implement the Digital Infrastructure and Video Competition Act of 2006, p. 11 ("OIR") (footnotes omitted).
2 For example, § 5940(e)(6) requires that the applicant describe the proposed video service area footprint including the socioeconomic status information for all residents within that footprint.

any local entity where the applicant will provide service."[3] Could the Legislature have intended that the locality, which continues to have significant authority over video franchisees, be served a copy of the application merely as a formality? Rather, it is a more logical reading that the localities are served the application to ensure that they are satisfied with the application and to be able to file a protest if necessary.

Furthermore, § 5890 specifically provides that the Division of Ratepayer Advocates ("DRA"),

> …shall have authority to advocate on behalf of video customers regarding renewal of a state-issued franchise and enforcement of Sections 5890, 5900, and 5950. For this purpose, the division shall have access to any information in the possession of the commission subject to all restrictions on disclosure of that information that are applicable to the commission.[4]

It is certainly a valid interpretation that this language is a confirmation of DRA's role, rather than any intent to limit DRA's advocacy on behalf of video customers to franchise renewals only. Regardless, this language does not give DRA the *exclusive* authority to advocate on behalf of customers in this context. Therefore, since the Legislature anticipated the need for consumer advocacy on these matters by singling out DRA, all interested parties should be permitted to protest initial applications and renewals.

While the video franchise legislation was intended to promote entry and competition in the video market, the Legislature was equally concerned that all consumers receive the benefits of such competition. Thus, AB 2987 is intended to

> Promote widespread access to the most technologically advanced cable and video services to all California communities regardless of socioeconomic status; protect local government revenues and control of public rights-of-way; require market participants to comply with all applicable consumer protection laws;…continue

[3] Cal. Pub. Util. Code § 5940(D).
[4] Cal. Pub. Util. Code § 5890(k).

> access to and maintenance of the public education and government (PEG) channels.[5]

In addition, § 5940 specifically prohibits the cross-subsidization of video services by basic telephone service. TURN submits that it is a fundamental misinterpretation to read AB 2987 as prohibiting protests when that very legislation simultaneously seeks to protect consumers on a number of levels. The ability to protest an application is an essential vehicle for interested parties to ensure that adequate procedures are in effect to comply with the legislative intent and the letter of the law. It is an abuse of discretion for the Commission to take away that right.

Further, a protest period is consistent with the statutorily mandated application deadlines set out in §5840(h). Even under the 44 day process, a substantive protest could easily be submitted under a standard 20 day time frame from the appearance in the Daily Calendar (as it is for Advice Letters) and still allow the Commission 10 additional days to review the protest and determine whether the application is incomplete based on Commission staff review or the protests received. Once an application is deemed incomplete, the applicant has the duty to revise and supplement the application starting the 30 day clock again. While one goal is to ensure timely and efficient review of the applications to meet these deadlines, the other goal must be to ensure sufficient review by a variety of stakeholders to determine whether the applicant satisfies all statutory requirements. The later goal cannot be sacrificed for the sake of efficiency.

Finally, the Commission's logic for prohibiting protests is entirely circular. The OIR argues that since the Commission has been given the "sole state video franchising authority" no protests should be allowed. However, the Commission has "sole" authority

[5] Cal. Pub. Util. Code § 5810(a)(2).

in a large number of areas, yet the ability for parties to protest is an essential part of the functioning of the Commission and its ability to carry out that authority. For example, the Commission has the sole authority to grant certificates of public convenience and necessity; the sole authority to approve or disapprove mergers and sales of utility assets; and in companies still subject to rate regulation, the sole authority to approve/disapprove rate increases. No one has seriously argued that potentially affected parties cannot file protests to these actions. It is an indisputable fact that the protest procedure has historically been an important part of the regulatory process and the due process rights associated with that process. There is nothing in AB 2987 or in the OIR that supports the elimination of these rights.

III.INTERVENOR COMPENSATION

In the OIR the Commission invited comments on

> …whether we should permit intervenor compensation for participation in Commission proceedings arising directly out of our authority under AB 2987. We seek to determine whether we can compensate those who intervene in this rulemaking; in an application or renewal; in a complaint; or in an investigation brought pursuant to AB 2987.[6]

Sections 1801, et seq. of the Public Utility Code pertain to intervenor compensation. § 1801 articulates that the purpose of the section is to provide compensation for costs of participation or intervention "in <u>any</u> proceeding of the Commission."[7] § 1801.3(a) states that the provisions of the section shall apply to "all formal proceedings"[8] of the Commission. § 1802(f) defines "proceeding" as an application, complaint, or investigation, rulemaking, alternative dispute resolution

6 OIR, pp. 6-7 (footnote omitted).
7 Cal. Pub. Util. Code § 1801 (emphasis added).
8 Cal. Pub. Util. Code § 1801.3(a).

procedures in lieu of formal proceedings as may be sponsored or endorsed by the commission, or other formal proceeding before the commission."[9] And, § 1803 provides that the Commission shall award fees and costs for "participation in a hearing or proceeding."[10] There is nothing in §§ 1801, et seq. to suggest that the Commission has the discretion to declare proceedings off-limits for intervenor compensation purposes.

Further, it is totally unclear what possible appropriate outcome would be served by the determination that intervenor compensation not be permitted. The intervenor compensation statute instructs the Commission to administer the provisions "in a manner that encourages effective and efficient participation of all groups that have a stake in the public utility regulation process."[11] The Commission has long held that it wishes "to continue to encourage thoughtful participation even where specific recommendations were not adopted."[12] The Commission has also encouraged intervenor participation and rewarded compensation for intervenors to assist "the Commission to develop a comprehensive record."[13]

In addition, the language of AB 2987 that amends § 401 of the Public Utility Code evidences a clear intent that the Commission treat its new video franchising responsibilities in the same manner as the Commission treats its other regulatory duties including the collection of sufficient fees to enable the Commission to meet its mandates.[14] There is nothing in the OIR or the video franchise legislation that serves to

9 Cal. Pub. Util. Code § 1802(f).
10 Cal. Pub. Util. Code § 1803.
11 Cal. Pub. Util. Code § 1801.3(b).
12 See, for example, D.06-04-036, p. 10
13 See, for example, D.06-09-008, pp. 10-11.
14 See, Cal. Pub. Util. Code § 401 and § 5810(3). For further evidence of Legislative intent on this issue see, Cal. Pub. Util. Code §5810(a)(3) which acknowledges that the Commission must collect funds in "same manner" and under the "same terms" as it does for the currently regulated entities to ensure it has funds to "provide adequate staff and resources to appropriately and timely process applications of video service providers and to ensure full compliance with the requirements of this division." Hearing from the

differentiate the existing proceeding and any proceeding relating to video franchising from any others where intervenors could participate and claim compensation.

IV.THE PROPOSED RULES ARE INSUFFICIENT TO ENSURE COMPLIANCE WITH SECITON 5940 OF THE P.U. CODE

The OIR acknowledges that the Legislature made it clear that it intended for the Commission to perform the duties described in the statutory provisions regarding cross-subsidization, set forth in § 5940 and § 5950.[15] Yet, inexplicably, both the OIR and the Draft General Order fail to address how the Commission will perform this duty.

Section 5940 states:

> The holder of a state franchise under this division who also provides stand-alone, residential primary line, basic telephone service shall not increase this rate to finance the cost of deploying a network to provide video service.

In the Bill Analysis prepared for AB 2987, the Legislature explained the intent of Sections 5940 and 5950.

> Cross-subsidy Protection: Competition is unfair if one competitor can use the profits of a relatively uncompetitive business to subsidize its entry into a relatively competitive business. This anti-competitive behavior hurts customers because it creates an unlevel playing field, making it more likely that competition will be neither robust nor durable. Most telecommunications markets are competitive; competition keeps a lid on rate increases and so provides a check against anti-competitive cross subsidy. But the market for basic residential service is not competitive. While there is some substitution of cellular service for basic residential service, and there are a few competitors such as Cox, by and large there is little competition.
>
> This bill deals with the potential for cross-subsidization by freezing rates for basic residential telephone service at current levels until 2009, with PUC authorized to raise those rates to reflect inflation increases. *Additionally, this bill prohibits all telephone companies from raising the price of basic telephone service to finance the cost of providing cable service.*[16]

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public through the protest and intervenor process is one major avenue for the Commission to ensure it meets this statement of legislative intent when it considers franchise applications.

15 OIR, p. 5.

16 AB 2987 Bill Analysis, p. 10-11 (emphasis added),

P.U. Code Section 5950 freezes stand-alone basic residential exchange rates until January, 2009. This is separate and distinct from § 5940. Pursuant to §5940, carriers are prohibited from increasing the rate for stand-alone residential, primary line basic exchange service to finance the cost of deploying their video networks, and this obligation does not disappear once the rate freeze imposed by the Legislature, or the rate freezes imposed by the Commission in D.06-08-030 end. Accordingly, the Commission has a statutory obligation to ensure that future rate increases imposed by telephone companies for stand-alone residential primary line service are not undertaken to finance deployment of video networks.

It is imperative that the Commission address this issue now in this OIR and in the General Order. California's largest telephone companies, AT&T and Verizon, are already in the process of deploying networks that are designed to carry video and broadband services, and stand-alone, residential primary line, basic telephone service.[17] In D. 06-08-030, the Commission granted AT&T, Verizon, Frontier and SureWest extensive pricing flexibility, including the unfettered authority to raise the price for stand-alone, residential primary line, basic telephone service – and do so on a geographically deaveraged basis – pending the Commission's reevaluation of the CHCF-B.[18] As will be discussed below, there is substantial evidence that carriers today are identifying the increasing investments associated with the provisioning of video services as investments in *regulated* services. Thus, *any* rate increase to stand-alone residential primary line basic telephone service will automatically have the potential to violate AB 2987 because the Incumbent Local telephone Companies ("ILECs") have intermingled the investments and expenses

17 See, for example, http://www.sbc.com/gen/press-room?pid=4800&cdvn=news&newsarticleid=21633, and http://news.com.com/Verizons+Fios+services+build+momentum/2100-1034_3-6101038.html
18 D.06-08-030, p. 31.

associated with the provision of video services with the investments and expenses of providing basic telephone service. If the Commission fails to establish reporting requirements in the final G.O. that are granular and consistent among companies , it will be unable to fulfill its statutory obligation to ensure no cross subsidy between stand alone service and video services.

A.Regulated/Non-Regulated Cost Allocation

Video services are non-regulated services. Thus, they are subject to the federal cost allocation rules under Code of Federal Regulations Part 64, specifically, §64.901(b)(4), which states:

> The allocation of central office equipment and outside plant investment costs between regulated and non-regulated activities shall be based upon the relative regulated and nonregulated usage of the investment during the calendar year when nonregulated usage is greatest in comparison to regulated usage during the three calendar years beginning with the calendar year during which the investment usage forecast is filed.[19]

However, there are mixed signals coming from California ILECs with regard to how they are following these rules. For example, Table 1, below, shows the Part 64 history for AT&T and Verizon California from 1999 to 2005. It can be seen that AT&T has maintained a (slightly) declining allocation of cable and wire facilities between the regulated and non-regulated side. Verizon has slightly increased the allocation of cable and wire facilities to the non-regulated side.

Table 1: Cable and Wire--Regulated v. Non-Reg ($000)							
Year							
	2005	**2004**	**2003**	**2002**	**2001**	**2000**	**1999**

19 47 CFR §64.901(b)(4).

AT&T Regulated	$15,168,884	$14,799,067	$14,467,169	$14,123,602	$13,621,421	$12,909,118	$12,302,351
Verizon Regulated	$5,244,786	$4,915,639	$4,775,582	$4,696,638	$4,610,871	$4,495,777	$4,380,102
AT&T Non-reg	$11,349	$11,349	$11,349	$11,348	$11,348	$11,347	$11,345
Verizon Non-reg	$63,164	$27,253	$0	$0	$0	$223	$222
AT&T Total	$15,180,233	$14,810,416	$14,478,518	$14,134,950	$13,632,769	$12,920,465	$12,313,696
Verizon Total	$5,307,950	$4,942,892	$4,775,582	$4,696,638	$4,610,871	$4,496,000	$4,380,324
AT&T Ratio Non-reg/Total	0.07%	0.08%	0.08%	0.08%	0.08%	0.09%	0.09%
Verizon Ratio Non-reg/Total	1.19%	0.55%	0.00%	0.00%	0.00%	0.00%	0.01%

FCC Report 43-03, the ARMIS Joint Cost Report
Table I. Regulated/Nonregulated Data

However, it can be seen in Table 2, below, that both AT&T and Verizon have been expanding fiber deployment substantially during that same period, as reflected in the reporting of regulated operations.

Table 2: ARMIS Report of Regulated Cable and Wire Facilities (Sheath Kilometers)

	Year						
	2005	2004	2003	2002	2001	2000	1999
AT&T Total Metallic	353,608	351,827	338,644	329,937	327,712	324,267	323,865
Verizon Total Metallic	112,496	113,142	112,253	111,543	111,050	110,647	109,448
AT&T Total Fiber	42,574	39,883	36,848	34,125	30,440	27,519	25,695
Verizon Total Fiber	16,012	17,296	11,894	11,383	10,880	10,003	9,000
AT&T Fiber/metallic ratio	12.04%	11.34%	10.88%	10.34%	9.29%	8.49%	7.93%
Verizon Fiber/metallic ratio	37.61%	43.37%	32.28%	33.36%	35.74%	36.35%	35.03%

The data is an indicator that fiber deployment has been expanding in recent years, but that the majority of fiber is kept on the regulated books of account, the same accounts used to track investments and expenses associated with regulated basic local service. Just what is all the extra fiber for? It might be used to provide voice services; but, given the aggressive push by the ILECs to enter the video market, it is likely that the primary driver for this investment is the provision of video services in those markets where the service is offered. This opens the door for the improper recovery of these costs for video services from rates for basic service offerings. In essence the ILECs are "laying fiber away" on their regulated books of account, to be recovered from future basic service rate increases. But the Commission will have no way of knowing whether this happening by pure reliance on ARMIS data which may not accurately reflect the regulated versus non-regulated expenditures of these entities.

B.Identification of ILEC video architecture

If the Commission is to enforce §5940, it must establish reporting requirements that allow it to identify the ILEC's video architecture. The nature and extent of sharing of facilities utilized to provide both video and basic voice services must be quantified. In D.06-08-030, the Commission made it clear that it intends to rely heavily on ARMIS data to carry out duties that require the submission of monitoring reports.[20] However, the ARMIS data in and of itself is not enough for the Commission to satisfy its statutory requirements. In addition to the proper booking of expenditures, the separate

20 D.06-08-030, p. 196.

identification of video architecture (regardless of whether it is also used for voice) is critical for the evaluation of data from ARMIS to be meaningful. Given the deaveraging provisions of the URF, the focus of the data must be granular, directed at the wire center, as rate changes will now be permissible at less than a state-wide level and the Commission must analyze these rate changes to ensure no cross-subsidy. If the Commission fails to establish adequate reporting requirements, ILECs would have the ability to unlawfully raise rates for stand-alone, residential primary line basic service in areas of the state where the new networks are not even being deployed while keeping rates unreasonably low for bundled offerings of voice and data in other more desirable areas. Important categories of information associated with architecture would require the following types of information from the ILEC:

- Identification of wire centers or other market areas where video services are being deployed.
- Information regarding the targeted investments in these areas, which can then be compared with investment in areas where video services are not deployed.

Listed below are types of information which could be evaluated on a wire-center level. The Commission would need to evaluate the information identified for a reasonable period of time, for example, the five (5) most recent years:

- The length of fiber feeder plant, and number of fiber feeder circuits and capacity of fiber feeder circuits.
- The amount of dark fiber deployed in feeder plant.
- The amount of fiber deployed in distribution plant.
- Investment in video-related electronics, such as that associated with the provisioning of IP-Television.
- Sharing of floor space/rack space in wire centers for the provision of video services.
- Sharing of poles/conduit/duct associated with the provision of video services.

In light of the Commission's acknowledgement that it must review a company's application at the parent company level including all related affiliates or otherwise a company could "evade important statutory provisions" relating to cross-subsidy

among others issues, the ILEC should also provide a list of the ILEC's affiliates that provide video services to the ILEC's customers, or that construct video facilities.[21]

C.Other ARMIS-Related Issue Identification

Since the plain language of AB 2987 requires that the rate for stand-alone, residential primary line basic service *shall not* increase to finance the cost of deploying a network for video service, the costs of video deployment contained in regulated books should be identified.

ARMIS may provide relevant information. However, there is no way to judge whether the ARMIS data is sufficient to satisfy the requirements of P.U. Code §5940, absent analysis of the ILEC's specific, ARMIS-related procedures. Not only must the ILEC properly book accounts between regulated and non-regulated services and provide the Commission granular information on the video network buildout within California, it must also use consistent reporting procedures and assumptions compared to other video service providers to make the data meaningful. Thus, from a reporting perspective, there must be procedures established in California that further develop ARMIS-based data, and result in a consistent set of procedures that allow the tracking of video-related investment. If ARMIS is the basis of reporting, ARMIS in the abstract, as reported by the FCC, must be made concrete for this task, and this can only occur if the ILECs are required to identify how they address video-related investments/expenses associated with ARMIS. Specific ARMIS-related questions/issues associated with the identification of costs of video deployment should include:

- How is each ILEC splitting video related investment between regulated and non-regulated operations, per the Part 64 process?

21 OIR at p.13.

- If video-related investments are recorded in the regulated books (for example, the substantial amounts of fiber documented above), then:
  - The ILEC must be required to identify any video-related investments or expenses, which flow into the ILEC's ARMIS 43-04 accounts. The ILEC must identify by subaccount detail any plant specific or plant non-specific expenses attributable to video services.
  - The ILEC must explain how the ILEC separates by jurisdiction the expenses, investment and revenues associated with video services. The ILEC must identify the Part 36 categories the expenses, investment and revenues are assigned to and the allocation factors used to allocate these items between the state and interstate jurisdiction. The ILEC should be required to provide the allocation factors by category and sub-category for the five most recent years.
- The ILEC must provide the ILEC's current Cost Allocation Manual (CAM).
- The ILECs should be required to identify and provide all written procedures maintained by the ILEC that describe the costs to be included and the processes followed by the ILEC in establishing the prices for assets transferred to or services provided to affiliates and subsidiaries and all such written procedures used by affiliates or subsidiaries in determining the prices set by them for services rendered to the ILEC.
- The ILEC should provide, for each ILEC affiliate, the information required in each column of ARMIS 43-02, Table I-2, Analysis of Services Purchased From or Sold to Affiliates for the five most recent years.

As discussed above, the statutory provisions regarding rate increases for basic local service are overlaid on an environment where it is likely that regulated reporting through ARMIS is already reflecting substantial video-related investments being booked in regulated plant accounts. Investigation and/or discovery regarding the extent of the assignment of video-related services to the California operating environment is required. Given the strong likelihood that substantial investment in video-related technology is already reflected in regulated ARMIS accounts, these accounts cannot be taken at face value, and additional work must be done to identify the co-mingled data. Any rate increase to stand-alone, residential primary line, basic telephone service cannot include support for video services, per the statutory provisions. Currently, any rate increase requested has the strong potential to be unlawful, due to the likely inclusion of video-

related investment/expenses in the regulated books of account of California ILECs. This cannot continue and the Commission must take specific steps, spelled out in the General Order, what will be expected of reporting companies to ensure compliance with §5940.

V.COMMUNITY SERVICE CENTERS SHOULD BE ACCESSIBLE TO PEOPLE WITH DISABILITIES

To the extent that franchise holders are required to provide services at community centers in underserved areas, the Commission should require that those community centers be accessible to people with disabilities, who are disproportionately low income and, therefore, disproportionately likely to rely on services at such community centers. Specifically, the Commission should require that all community centers be compliant with the access standards of Title 24 of the California Code of Regulations ("Title 24") and the Americans with Disabilities Act Access Guidelines ("ADAAG"). In the event that some aspects of the community centers are not fully compliant with those standards, the Commission should ensure, at the very least, that people with disabilities can safely access the services provided at such centers. This includes: (1) accessible parking facilities for those community centers that provide parking; (2) an accessible pathway from the parking area to the entrance of the community center; (3) an accessible entrance to the community center; (4) an accessible pathway from the entrance to the community center to the location where the services are provided; (5) accessible equipment and furniture used in connection with the services provided; and (6) accessible restrooms for those community centers that have restrooms available to the public.

VI.CONCLUSION

The California Legislature has created the opportunity for consumers to benefit from a competitive video services marketplace. In doing so, however, the Legislature has been mindful of the potential for harm due to cross-subsidization and discrimination and crafted safeguards to guard against such actions. It is up to the Commission to enforce these safeguards and TURN respectfully urges the Commission to view its mandate as more than the mere granting of franchises and collection of fees.

October 25, 2006

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I, Cory Oberdorfer, certify under penalty of perjury under the laws of the State of California that the following is true and correct:

I served the attached:

COMMENTS OF THE UTILITY REFORM NETWORK

by sending said document by electronic mail to each of the parties on the Service List to **R.06-10-005**.

Executed this October 25, 2006 in San Francisco, California.

_____/s/_____

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CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

Proceeding: R0610005 - CPUC - CABLE TELEVIS
Filer: CPUC - CABLE TELEVISION
List Name: INITIALLIST
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